

# **Exhibit A**

processors or systems-on chips that are part of the Accused Products.

18. The term “Gesture” means movement, position, or state of a body part, including,

but not limited to, the whole body, any part thereof, and facial expressions.

19. The term “Applications” means any software application that runs on the Accused

Products that uses one or more Components for determining Gestures for use by the Application,

including, but not limited to, user applications, application programming interfaces (API),

firmware, drivers, operating-system components, and the like.

20. The term “Relevant Time Period” means the time period beginning with six years before the filing of the Complaint in this case through the expiration of the Patents-in-Suit. The term “Relevant Time Period” in no way limits or modifies any period of time that is otherwise expressly stated or identified in any request herein.

21. All terms used herein that are capitalized, either initially or in their entirety, shall be construed as if they appeared in lower case letters, as may be necessary to bring within the scope of these Interrogatories all responses that might otherwise be construed to be outside its scope.

22. The terms “all” and “each” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the discovery request all responses that might otherwise be construed to be outside of its scope.

23. The connectives “and” and “or” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the document request all productions that might otherwise be construed to be outside of its scope.

24. The use of the singular form of any word includes the plural and vice versa.

25. The term “person” or “entity” refers to natural persons, groups of natural persons,

### **DEPOSITION TOPICS**

1. The identity and description of each mobile device, handheld device, mobile phone, cellular phone, smartphone, or tablet (“Devices”) and Accused Product made, created, configured, acquired, put into service, used, offered for sale, or sold, within the United States, or imported into the United States by or for Defendant during the Relevant Time Period, including, for each Accused Product and Device:

- (a) name;
- (b) model number and product code;
- (c) wireless carrier (if applicable);
- (d) all internal names, code names and designations;
- (e) initial operating system version;
- (f) any chipset(s) responsible for the detection, identification, or interpretation of Gestures;
- (g) date first sold or offered for sale in the United States.

2. The identity and description of the Components for each Accused Product and each Device that are responsive to Topic No. 1.

3. The identity and description of every Application, that can detect, process, interpret, respond to, or be controlled by Gestures, that is (1) preloaded on the Accused Products and/or Devices or (2) available for download on the Accused Products or Devices that are responsive to Topic No. 1, including for each Application:

- (a) the name of the Application;
- (b) whether the Application was preloaded on the Accused Products and/or Devices or available for download on the Accused Products or Devices;

(c) the Accused Products and/or Devices for which the Application was preloaded or available for download;

(d) the Gestures that the Application can detect, process, interpret, respond to, or use for control; and

(e) the function(s) of the Application that are controlled by Gesture(s).

4. The design and manufacturing of the Accused Products and the Devices that are responsive to Topic No. 1.

5. The algorithms used in the Accused Products and Devices responsive to Topic No. 1 to detect, process, interpret, respond to, or be controlled by Gestures.

6. The use of a Light Source in the Accused Products and Devices responsive to Topic No. 1 to detect, process, interpret, respond to, or be controlled by Gestures.

7. Your decision to include the capability to detect, process, interpret, respond to, or be controlled by Gestures in the Accused Products and Devices responsive to Topic No. 1.

8. The complete process for designing, developing, and manufacturing the Accused Products and the Devices that are responsive to Topic No. 1.

9. The complete process for designing, selecting, developing, and/or implementing Components on the Accused Products and the Devices that are responsive to Topic No. 1.

10. The complete process for designing and developing the Applications that are responsive to Topic No. 3.

11. On a monthly basis for the Relevant Time Period, the identity and description all of Your revenue and expenditures associated with the Accused Products and the Devices that are responsive to Topic No. 1, including, but not limited to:

(a) quantity sold;